

UNITED STATES DISTRICT COURT

for the

District of Maryland

United States of America

v.

MICHAEL KEY

)
)
)
)
)

Case No.

16-0842SAG

BY

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2015 in the county of _____ in the
District of Maryland, the defendant(s) violated:

Code Section

Offense Description

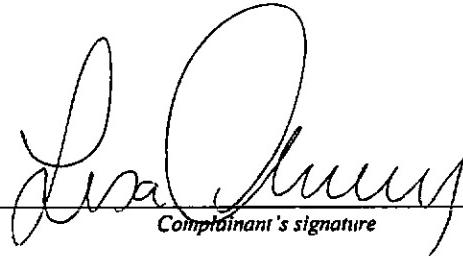
18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.



Lisa Christy
Complainant's signature

Special Agent Lisa Christy, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/5/16



Stephanie A. Gallagher, U.S. Magistrate Judge
Judge's signature

Stephanie A. Gallagher, U.S. Magistrate Judge

Printed name and title

City and state: Baltimore, Maryland

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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your Affiant, Special Agent Lisa Christy, being duly sworn, depose and state as follow in support of a criminal complaint against and arrest warrant for:

Michael Key, year of birth 1988.

AFFIANT BACKGROUND

1. Your affiant been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since September 9, 2008. Since this time, your affiant completed the Basic Criminal Investigator Training Course at the Federal Law Enforcement Center located in Brunswick, Georgia. Your affiant has also completed the Special Agent Basic Training Course at the ATF National Academy located in Glynco, Georgia. Your affiant is currently assigned to the Baltimore Field Division's High Intensity Drug Trafficking Area (HIDTA) Group to conduct criminal investigations into cases of illegal possession/transfer of firearms, firearms trafficking, violent crimes involving firearms and narcotics trafficking.
2. Your affiant has been a part of the HIDTA group since April, 2009, and has participated in numerous search warrants, arrests and street enforcements. Your affiant has been the case agent on approximately 60 cases involving defendants using and/or possessing firearms in Baltimore City, and also became an interstate nexus expert in April 2014.
3. Prior to joining ATF, your affiant served as a Philadelphia Police Officer in the 35th district for about 2 ½ years. During this time, your affiant's duties involved responding to emergency 911 calls, and conducting vehicle and pedestrian investigations. Your affiant has a Bachelor of Arts Degree in Politics from Ursinus College.
4. I make this Affidavit in support of a criminal Complaint charging the defendant, Michael Key, with possession of a firearm by a previously convicted person (in violation of 18 U.S.C. § 922(g)(1)). This Affidavit is based on information I have received from other law enforcement officers and witnesses, and from police and law enforcement reports. I have not included all of the information known to law enforcement officers in this Affidavit, but I do not believe that I have omitted any information that would tend to defeat a showing of probable cause.

PROBABLE CAUSE

1. On October 19, 2015, at approximately 6:40 p.m., Baltimore City Police Officers on patrol observed the defendant, later identified as Michael Key, walking with his right hand pressed against his midsection. Once the defendant noticed the presence of the officers, the defendant turned around and fled from the police in full sprint.

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2. One of the officers exited the car and pursued the defendant on foot, while the remaining officers chased the defendant in the vehicle. During the pursuit, officers observed the defendant grabbing the right side of his torso, removing a handgun from his person and tossing the handgun away from the street and towards the yard of a residence. Officers caught and apprehended the defendant, and then recovered the firearm at the location where it was thrown. The defendant was placed under arrest.
3. The firearm was identified as a Walther P22 semi-automatic pistol, and was loaded with five (5) CCI .22 Long Rifle caliber cartridges. I know from my training and experience as an ATF agent that Walther handguns are manufactured outside of Maryland, and that this handgun would have traveled in interstate commerce prior to its recovery in this state. Examination of the weapon indicates that it appears to be capable of expelling a projectile by the action of an explosive, to be readily convertible to do so, or to have the frame or receiver of such a weapon.
4. Prior to October 19, 2015, the defendant had been convicted in a court of a crime punishable by a term of imprisonment exceeding one year.


SA Lisa Christy
Bureau of Alcohol, Tobacco, Firearms and Explosives

Sworn to and subscribed before me

This 5th day of April 2016 at Baltimore, Maryland


Stephanie A. Gallagher
United States Magistrate Judge
District of Maryland